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March 4, 1996

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

DOCKET FILE COPY ORIGINAL

Re: Comments of GO Communications Corporation on
Interconnection Between Local Exchange Carriers
And CMRS Providers, CC Docket No. 95-185

Dear Mr. Caton:

Enclosed please find for filing an original and four copies of GO Communications Corporation's comments on the FCC's Notice of Proposed Rulemaking on Interconnection Between Local Exchange Carriers And CMRS Providers, CC Docket No. 95-185, released January 11, 1996. We have also enclosed a file copy which should be stamped and returned with the courier.

If you have any questions regarding this filing, please contact the undersigned at (703) 518-4302.

Sincerely,

A handwritten signature in cursive script, reading "Leo R. Fitzsimon".

Leo R. Fitzsimon

Enclosures

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***Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554***

In the Matter of

Interconnection Between Local Exchange
Carriers and Commercial Mobile
Radio Service Providers

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CC Docket No. 95-185

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MAR - 4 1996

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

COMMENTS OF GO COMMUNICATIONS CORPORATION

GO COMMUNICATIONS CORPORATION

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March 4, 1996

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SUMMARY

The *Notice of Proposed Rulemaking* seeks comment on the Commission's proposal to implement "bill and keep" as an interim interconnection arrangement between Local Exchange Carrier ("LEC") and Commercial Mobile Radio Service ("CMRS") provider networks. GO supports the Commission's proposal and believes that existing interconnection policies are not adequate to encourage the development of new technologies such as CMRS, especially in competition with LEC-provided wireline local exchange service. A bill and keep interconnection arrangement is an appropriate interim measure which will promote the rapid development of such competition.

As importantly, the Commission should adopt the broader long-term concept of symmetrical rates for traffic termination between LECs and CMRS providers to implement the Telecommunications Act requirement of reciprocal compensation for the transport and termination of traffic.

In order to ensure fair competition in the local exchange market, interconnection rates must also be nondiscriminatory between CMRS providers. The Commission must not allow large CMRS providers such as AT&T and the RBOCs to negotiate lower interconnection rates with LECs based solely on their negotiating leverage and market power. To prevent this anti-competitive situation, the Commission should impose an "equal per unit of traffic" rate requirement on all LEC/CMRS interconnection agreements. All competing LECs and CMRS providers would be required to charge the same rate for interconnection, ensuring robust competition in the local exchange market.

GO agrees with the Commission's conclusion that it has the authority to implement a national interconnection policy over both intrastate and interstate LEC/CMRS interconnections. The Telecommunications Act of 1996 requires the Commission to develop a national interconnection policy with mandatory federal requirements for interstate and intrastate LEC-CMRS interconnection. Such a requirement is consistent with the goals of both Congress and the Commission of creating a nationwide wireless network.

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COMMENTS OF GO COMMUNICATIONS CORPORATION

GO Communications Corporation ("GO") hereby submits its comments in response to the Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding.¹ GO commends the Commission for its efforts to develop fair and pro-competitive requirements for interconnection between local exchange carriers ("LECs") and commercial mobile radio service ("CMRS") providers.

GO supports the Commission's proposal to implement an interim bill and keep interconnection compensation arrangement but believes that any compensation plan adopted by the Commission must be based on the broader concept of reciprocal compensation as required by the Telecommunications Act of 1996 (the "1996 Act")². Initially, LECs and CMRS providers would charge a zero rate for terminating the other carrier's traffic under a "bill and keep" approach. The Commission should monitor the local exchange market to determine that a competitive foothold has developed for CMRS providers. When the Commission has made this

¹ Notice of Proposed Rulemaking, CC Docket No. 95-185/94-54, FCC 95-505, (January 11, 1996).

² Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996).

determination, carriers can negotiate fair and reasonable long-term interconnection agreements. The rates ultimately negotiated between CMRS providers and LECs must be symmetrical and nondiscriminatory. Large CMRS providers must not be allowed to use their negotiating leverage to gain lower rates than smaller service providers. Rates for interconnection between LECs and CMRS providers should therefore be on an equal per unit of traffic basis, ensuring a level playing field in the newly competitive local exchange market. The Commission must also ensure that LECs are not able to simply shift the costs under the reciprocal termination plan it adopts. Finally, the Commission has been given the clear authority to implement a national interconnection policy by Section 251 of the 1996 Act.

I. INTRODUCTION

GO agrees with the Commission's conclusions regarding the importance of fair interconnection arrangements and generally supports the interim bill and keep arrangement proposed by the Commission with several suggested modifications. To prevent LECs from simply shifting any revenue decrease they incur as a result of bill and keep to interconnection elements not covered by bill and keep, GO suggests that the Commission broaden the scope of the types of interconnection covered under the NPRM and mandate that reciprocal termination apply to all types of interconnection involved in the termination of calls between LECs and CMRS providers as required by Section 251(b)(5) of the 1996 Act. GO also proposes that the compensation regime adopted by the Commission be based on the concept of reciprocal compensation for all minutes passed between carriers and that the rate of reciprocal compensation be symmetrical between the carriers. The initial rate for the interim period during which a bill and keep policy is in effect would be set at zero. This interim period would last until

long-term symmetrical interconnection rates can be implemented through negotiation of the respective parties under the broad oversight of state and federal regulatory bodies.

II. AN EFFICIENT LEC/CMRS INTERCONNECTION POLICY IS ESSENTIAL TO PROMOTE EFFECTIVE COMPETITION IN LOCAL EXCHANGE SERVICES.

In order to create a truly competitive local exchange market, personal communications service (“PCS”) carriers and other CMRS providers must be afforded fair and reasonably priced interconnection to the public switched telephone network. A necessary requirement for such a competitive market is that all CMRS providers receive reciprocal compensation for terminating the traffic of any other telecommunications carrier. PCS has the potential to provide real competition to the entrenched local exchange carriers by providing subscribers a complete wireless system alternative to replace their current reliance on local wireline service.

The development of this much-needed competition is one of the Commission’s stated goals for PCS.³ This federal goal of increasing competition in the local exchange telephone market was further evidenced by the passage of the 1996 Act. As described in the Joint Explanatory Statement of the Committee of Conference, the purpose of the 1996 Act is:

[T]o provide for a pro-competitive, de-regulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies and services to all Americans by opening *all telecommunications markets to competition*.⁴

The 1996 Act also requires LECs to provide, among other things, interconnection to other telecommunications carriers at fair and non-discriminatory rates and to establish reciprocal

³ NPRM at ¶¶ 2-3; *See also* In the Matter of Amendment of the Commission’s Rules to Permit Flexible Service Offerings in the Commercial Mobile Radio Services, Notice of Proposed Rulemaking, WT Docket No. 96-6, (January 25, 1996) at ¶ 8.

⁴ H.R. Conf. Rep. 458, 104th Cong., 2d Sess. 113 (1996) (emphasis added).

compensation agreements with other carriers for the transport and termination of telecommunications.⁵

Because technologies such as PCS will be a competitive threat to existing wireline LECs, the LECs are likely to oppose any interconnection regime which promotes true and fair competition to their heretofore monopoly local exchange markets. LECs have already demonstrated their reluctance to enter into reasonable interconnection agreements with wireless providers by ignoring the Commission's explicit requirement of mutual compensation for interconnection with cellular providers.⁶ However, the arrival of new wireless services such as PCS creates a new environment for LEC/CMRS interconnection. As we explained earlier in this proceeding, it will be impossible for PCS to reach its full potential and be a viable replacement for local wireline exchange service if the Commission does not mandate a fair and balanced compensation policy for LEC/CMRS interconnection.⁷

A. The Commission's Bill And Keep Proposal is Sound

The new business models of PCS and other emerging wireless services dictate that the Commission implement an interconnection and compensation regime which is fair to each interconnecting party, is enforceable and furthers the Commission's goals of promoting the development of new wireless technologies in order to provide much-needed competition to both cellular and wireline local exchange providers. In the NPRM, the Commission tentatively concludes "that a 'bill and keep' arrangement represents the best interim solution with respect to

⁵ 1996 Act, § 251 *passim*.

⁶ See The Need to Promote Competition and Efficient Use of the Spectrum for Radio Common Carrier Services, 2 FCC Rcd. 2910 (1987).

⁷ Comments of Columbia PCS (predecessor of GO Communications Corporation) at 6, Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Services, Notice of Proposed Rulemaking and Notice of Inquiry, 9 FCC Rcd. 5408 (1994) .

terminating access from LEC end offices to LEC end-user subscribers, and with respect to terminating access from equivalent CMRS facilities to CMRS subscribers.”⁸ GO agrees that bill and keep is an appropriate interim arrangement for LEC/CMRS interconnection and wishes to make the following suggestions to the Commission.

1. Any Compensation Agreement For Interconnection Must be Based on Symmetrical Rates

GO supports the Commission’s tentative conclusion that it should adopt bill and keep as an appropriate interim interconnection arrangement but asserts that any compensation arrangement adopted by the Commission should be based on the broader concept of reciprocal compensation for interconnection and termination of interstate and intrastate traffic between LECs and CMRS providers. Such reciprocity should be defined as symmetrical rates whereby the LEC and the CMRS providers charge each other the same rate for interconnection and termination. Such a compensation scheme would ensure that each carrier recovers the costs of providing interconnection to the other in the proportion of minutes that each carrier sends to the other. As discussed below, these rates must also be non-discriminatory and subject to "an equal per unit of traffic" requirement to ensure that all CMRS providers are competing on fair terms.

Initially and during an interim period, the rate of reciprocal compensation would be set at zero and the interconnecting carriers would compensate each other for interconnection under a bill and keep arrangement. During this interim period, the structure of an enforceable mutual compensation arrangement would be in place until such time when the appropriate long term symmetrical compensation rates for LEC-CMRS interconnection and termination are negotiated by the parties and approved by the Commission. Such an interim arrangement would have the

⁸ NPRM at ¶ 60.

advantage of being administratively simple and would prevent LECs from using their market power to charge excessively high interconnection rates in order to thwart the emergence of competition in the local exchange market from CMRS providers.

Over time, symmetrical rates should be set during negotiations between all interconnecting CMRS providers and the incumbent LEC and competitive access providers (“CAPs”) in each state. As we advocated earlier in this proceeding, the Commission should request a “model” interconnection tariff or contract for LECs in each state.⁹ The Commission should review the model agreements to ensure that they conform to the Commission’s compensation policies. If they do conform, LECs should not be required to file the effective agreements on an ongoing basis. The Commission should instead be able to utilize the complaint process to remedy any material departures from the model agreements that would be on file with the Commission and be publicly available to all interconnecting carriers.

2. Symmetrical Rates For LEC/CMRS Interconnection Must Be Nondiscriminatory

The Commission must ensure that any compensation regime which includes the negotiation of interconnection rates between LECs and CMRS providers does not lead to the inequitable treatment of small CMRS providers. Large CMRS providers should not be able to use their leverage to negotiate favorable interconnection agreements with LECs. LECs must not be allowed to favor their own cellular affiliates with preferential pricing and volume discounts for interconnection. To prevent discriminatory treatment of smaller CMRS providers, all traffic accessing a LEC switch, whether tandem or end office, should be covered initially under the bill and keep arrangement and should thereafter be charged at an equal per minute rate.

⁹ See Columbia PCS Comments at 7.

Smaller CMRS providers have no negotiating leverage and would end up paying higher per-minute interconnection charges than their larger rivals in the absence of regulatory intervention. Such arrangements would be particularly harmful to emerging companies hoping to provide real competition to both wireline local exchange service and existing cellular service. Clearly such a situation would be contrary to the Commission's stated goals of encouraging the development of competitive local exchange and wireless communications markets.

The 1996 Act requires all incumbent LECs¹⁰ to provide interconnection "with the facilities and equipment of other telecommunications carriers" that is "at least equal in quality to that provided to the local exchange carrier itself or to any subsidiary, affiliate, or any other party to which the carrier provides interconnection" and at "rates, terms, and conditions that are just, reasonable, and *nondiscriminatory*."¹¹

Clearly, lower interconnection rates for some competitors negotiated solely due to unequal bargaining power would be discriminatory, anti-competitive and unjust in the newly competitive local exchange and wireless markets. This would be directly contrary to the intent of the Commission to "encourage the development of CMRS, especially in competition with LEC-provided landline service."¹² It would also be counter to the intent of Congress in passing the 1996 Act "to provide a pro-competitive . . . national policy framework . . . by opening all

¹⁰ An "incumbent" LEC means any LEC within an area that was providing telephone exchange service on the date of enactment of the 1996 Act and as of that date was either a member of the National Exchange Carrier Association or becomes a successor to or assignee of such member. See § 251 (h)(1).

¹¹ § 251 (c) (2) (C) and (D) (emphasis added)

¹² NPRM at ¶ 2.

telecommunications markets to competition.”¹³ In order to make sure that CMRS providers are competing on a level playing field, the Commission must require each LEC to charge all interconnecting CMRS providers the same rate for interconnection.

As mentioned by the Commission in the NPRM, we had urged the Commission to prescribe an “equal per unit of traffic” requirement on all LEC/CMRS interconnection agreements.¹⁴ Such a requirement would require all traffic between LECs and CMRS providers to be compensated at an equal rate, preventing LECs from negotiating deals with large CMRS providers which would give them a lower per minute interconnection rate than CMRS providers who do not have the negotiating leverage necessary to secure such lower rates. A similar requirement was imposed upon the Bell Operating Companies (“BOC”) following divestiture for the rates they charged interexchange carriers (“IXC”) for delivery or termination of IXC traffic. The Modified Final Judgment (“MFJ”) required that:

from the date of reorganization . . . until September 1, 1991, the charges for delivery or receipt of traffic of the same type between end offices and facilities of interexchange carriers within an exchange area . . . shall be equal, per unit of traffic delivered or received, for all interexchange carriers¹⁵

This equal per unit of traffic charge was mandated specifically to ensure that for a ten-year period in the newly competitive interexchange market, smaller IXCs would be able to compete with AT&T on a more equal footing. The Commission subsequently extended the equal per unit of traffic requirement in 1991, again recognizing its necessity for the continued development of competition in the long distance telephone market.¹⁶ The rational of promoting

¹³ H.R. Conf. Rep. 458, 104th Cong., 2d Sess. 113 (1996).

¹⁴ NPRM at ¶ 28; Columbia PCS Comments at 7.

¹⁵ United States v. AT&T, 552 F. Supp. 131, 233-234 (D.D.C. 1982), *aff’d sub nom.*, Maryland v. United States, 460 U.S. 1001 (1983).

¹⁶ *Action in Docket Case*, Report No. DC-1923, CC Dockets 78-72, Phase I, and 91-213 (1991).

competition in a nascent industry which applied to the application of the per unit of traffic requirement to the long distance industry applies equally to the newly competitive local telephone market.

B. LECs Must Not be Allowed to Simply Shift Costs Under Reciprocal Termination

In the NPRM, the Commission proposes that its compensation plan for reciprocal termination be applied only to “local switching facilities and connections to end users.”¹⁷ Under the Commission’s proposed scope of the types of interconnection covered under bill and keep, CMRS providers would be obliged to pay for the costs of dedicated transport between the CMRS facility and the tandem switch costs incurred by the LEC.

Just as when competition was developing in the interexchange market, the Commission should have all wireless and CAP based transport facilities utilizing LEC switching pay only on a per minute basis, and not be subject to dedicated access rates. Large wireless carriers such as AT&T (who also have enormous long distance traffic) can route traffic directly to end office switches, thereby getting a much lower effective price per minute than small wireless carriers. Therefore, all traffic that accesses a LEC switch should be charged on an equal per minute basis in order to promote competition until it gains a foothold. Dedicated facility charges to CMRS providers should apply only to point-to-point applications that do not terminate on a switch.

C. Bill and Keep is an Appropriate Interim Compensation Arrangement

It is important to note that the “bill and keep” plan recommended by the Commission is an interim and not a permanent proposal. The Commission has recognized that the current

¹⁷ NPRM at ¶ 25.

interconnection policies between LECs and CMRS providers are inadequate both to promote the development of new CMRS services such as PCS and to provide real competition to the LEC's historical monopoly in the provision of wireline local exchange service. To remedy this situation, the Commission states that it "should move expeditiously to adopt *interim* policies governing the rates charged for LEC-CMRS connection."¹⁸ GO supports bill and keep as an interim measure. As such, bill and keep will allow new competitors to establish themselves in the local exchange market without being hindered by the LECs setting unreasonable rates for interconnection.

GO agrees with the Commission's conclusions that bill and keep has several advantages as an interim solution. A bill and keep system is the most administratively simple interconnection regime. Interconnecting LECs and CMRS providers would not need to develop new accounting and billing systems in order to implement bill and keep. The Commission would not be burdened with having to devote its scarce resources to monitoring complex interconnection compensation arrangements between LECs and CMRS providers. As an interim measure, bill and keep is also the least regulatory form of reciprocal compensation, consistent with the goals of Congress in passing the 1996 Act.¹⁹ No complex system of Commission-mandated interconnection requirements would need to be formulated during a time when companies need to devote their energies to the challenge of newly competitive telecommunications markets. Competitors would simply be told to charge a zero rate for interconnection until the carriers can negotiate fair and reasonable interconnection arrangements, which should be filed in each state and with the Commission for review.

¹⁸ NPRM at ¶ 3 (emphasis added).

¹⁹ H.R. Conf. Rep. 458, 104th Cong., 2d Sess. 113 (1996).

III. THE FCC'S POLICIES SHOULD BE APPLIED TO BOTH INTERSTATE AND INTRASTATE INTERCONNECTION ARRANGEMENTS

In the NPRM, the Commission requested comment on three alternative approaches to implement its interconnection policies: (1) a federal interconnection framework that would directly govern LEC-CMRS two-carrier interconnection with respect to interstate services and that would serve as a model for state commissions considering intrastate issues; (2) a general mandatory federal policy framework or set of parameters to govern interstate and intrastate interconnection allowing state commissions a range of choices with respect to implementing specific plans; or (3) specific federal requirements for interstate and intrastate LEC-CMRS interconnection.²⁰ The Commission tentatively concluded that it has sufficient authority to implement any of these options, including the proposal to adopt on an interim basis a bill and keep approach for interconnection compensation.²¹

GO agrees with the Commission's conclusion that it has the authority to implement a national interconnection policy over both intrastate and interstate LEC/CMRS interconnections, including a reciprocal compensation plan with an interim bill and keep arrangement between LECs and CMRS providers. Moreover, GO believes that the recently enacted 1996 Act, in fact, directs the Commission to implement a national interconnection policy with mandatory federal requirements for interstate and intrastate LEC-CMRS interconnection, permitting State regulation and oversight and approval of interconnection agreements between carriers consistent with the statute and the new FCC rules implementing the 1996 Act.

²⁰ NPRM at ¶107-110.

²¹ NPRM at ¶111.

As the Commission acknowledged in the Supplemental Notice,²² since the release of the NPRM in this docket, Congress has enacted comprehensive telecommunications reform legislation which has a direct bearing on this proceeding, particularly with regard to the jurisdictional basis upon which the Commission can implement a national interconnection policy between LECs and CMRS providers. In Sections 251 and 252 of the 1996 Act, Congress sets forth the basic legal framework for the development of local telephone competition and establishes the jurisdictional parameters between the Commission and state regulators in implementing these new ground rules. Under the 1996 Act, the Commission is tasked with establishing regulations to implement a national interconnection policy without regard to intrastate or interstate distinctions. On the other hand, State regulators are assigned the duty of reviewing and approving individual interconnection agreements in accordance with the statute and the Commission's regulations.²³

As discussed above, Section 251 of the new law imposes a general duty on all telecommunications carriers to interconnect. It also requires all LECs to permit the resale of their services by other carriers; to provide number portability, dialing parity and access to rights-of-way; and to establish "reciprocal compensation arrangements" for the transport and termination of telecommunications.²⁴ Section 251(d) authorizes the Commission to establish the

²² Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers, Order and Supplemental Notice of Proposed Rulemaking ("Supplemental Notice"), CC Docket No. 95-185 (Feb. 16, 1996).

²³ Section 252 provides the mechanisms -- voluntary negotiations or arbitration -- for incumbent LECs and requesting telecommunications carriers to reach interconnection agreements. In Section 252, Congress places the burden for approving these agreements on State regulators and provides specific standards for States to follow in arbitrating or approving such agreements.

²⁴ Incumbent LECs have the additional obligations of negotiating in good faith the particular terms of agreements to meet the requirements listed above and of interconnecting for the transmission and routing of services at any technically feasible point within their networks. *See*

regulations necessary to implement these interconnection requirements within 6 months of the date of enactment of the 1996 Act.²⁵ The 1996 Act makes no distinction between interstate and intrastate traffic in directing the Commission to implement the new rules, including the new duty to establish reciprocal compensation arrangements. In fact, the 1996 Act provides that the Commission may preempt the enforcement of State access and interconnection regulations to the extent that they are inconsistent with the requirements of Section 251 and substantially prevent the implementation of Section 251 and the purposes of the new law -- the development of competitive markets.²⁶ Even the procedures set forth in the 1996 Act for a State commission to approve interconnection agreements or resolve open interconnection issues through arbitration acknowledge that the statute and the Commission's rules establish the national interconnection policy, not State regulations.²⁷

§§ 251(c)(1), (c)(2)(A) and (c)(2)(B). Such interconnection must be at least equal in quality to that provided by the incumbent LEC to itself or to any of its affiliates and must be on rates, terms and conditions that are just, reasonable, and nondiscriminatory in accordance with the obligations set forth in Sections 251 and 252. *See* §§ 251(c)(2)(C) and (D).

²⁵ Section 251(a) and (d).

²⁶ *See* §251(d)(3). This narrow preservation of state authority would permit the continued State enforcement of interconnection and access regulations in States that have already adopted reciprocal compensation requirements with bill and keep arrangements like the one contemplated by the Commission in this docket.

²⁷ For example, Section 252(c)(1) of the 1996 Act provides that in resolving open issues in an arbitration between a LEC and another carrier, a State commission shall "ensure that such resolution and conditions meet the requirements of section 251, *including the regulations prescribed by the Commission pursuant to section 251.*" § 252 (c)(1)(emphasis added). Likewise, in providing the grounds for rejection of an agreement reached by arbitration, the 1996 Act states that a State commission may only reject such an agreement "if it finds that the agreement does not meet the requirements of section 251, *including the regulations prescribed by the Commission pursuant to section 251*, or the standards set forth in subsection (d) of this section." § 252(e)(2)(B)(emphasis added).

The establishment of such a national interconnection policy for LECs and CMRS providers is also consistent with the purpose of the Communications Act, as amended, *inter alia*, by the 1993 Omnibus Budget Reconciliation Act to “regulat[e] interstate and foreign commerce in communication by wire and radio so as to make available, so far as possible, to all the people of the United States a rapid, efficient, Nation-wide, and world-wide wire and radio communication service with adequate facilities at reasonable prices”²⁸ The relevant sections of the 1993 Budget Act were a clear indication that Congress intended to establish a seamless national wireless infrastructure regulated by consistent regulatory classification of mobile service providers. Mandating a federal interstate and intrastate interconnection policy for all mobile service providers would be consistent with the intent of Congress.

The Commission's proposal to create a mandatory federal policy framework to govern interstate and intrastate interconnection appears to be the approach most consistent with the 1996 Act's mandate so long as it permits State commissions to oversee and approve interconnection agreements in a manner consistent with the statute and the FCC's rules implementing the statute. GO believes that the 1996 Act provides the Commission with clear authority to implement such a national framework and to order a reciprocal compensation plan that includes an interim bill and keep arrangement between LECs and CMRS providers as well as the modifications proposed by GO in these comments.²⁹

²⁸ 47 U.S.C. § 151.

²⁹ Clearly Congress contemplates that such “bill and keep” arrangements are included within the parameters of “just and reasonable” reciprocal compensation arrangements. *See* § 252 (d)(2)(A) and (B).

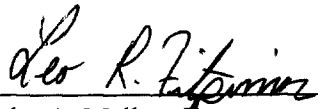
IV. CONCLUSION

In order to promote the development of a competitive wireless and local exchange industry, fair and reasonable LEC/CMRS interconnection policies must be adopted and mandated by the Commission. For the reasons stated herein, GO supports the Commission's proposal to mandate an interim bill and keep LEC/CMRS interconnection arrangement. The Commission has the clear jurisdictional authority to mandate such a policy under the Communications Act of 1934, as amended by the 1993 Budget Act and the 1996 Telecommunications Act. The Commission's proposal, as supplemented by GO in these comments will provide a real opportunity for meaningful competition to develop in the local exchange market.

Respectfully Submitted,

GO Communications Corporation

By:



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